

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:)	CHAPTER 11
W. R. GRACE & CO., ET AL.)	CASE NO. 01-01139^A (JKT)
Debtors)	(JOINTLY ADMINISTERED)

**RESPONSE AND OBJECTION TO DEBTORS' SECOND OMNIBUS OBJECTION
TO CLAIMS (NON-SUBSTANTIVE)**

Now come, John Errichetti, Case No. 01-01140, Claim 425, Candida Bachiocchi, Case No. 01-01140, Claim No. 429, Fred Van Patten, Case No. 01-01140, Claim 428 and Thomas Tremblay, Case No. 01-01139, Claim No. 427 through counsel, Melissa M. Olson, and for the reasons that follow, respond and object to the Debtors' Second Omnibus Objection to Claims (Non-Substantive).

The above named individuals were exposed to the asbestos products of the debtors and have suffered resulting injuries and / or death and submit supporting documentation of their injuries and claims. Proofs of claim were filed in a timely manner on their behalf.

Section 502(b)(1) of the Bankruptcy Code states in pertinent part that all claims filed under this section are allowed except to the extent that, among other provisions, the claim is contingent or unmatured.

The claims of the above named individuals are mature and enforceable as evidenced by the supporting documentation. The equities of each of the claims mandate that the claims be maintained and reviewed in the bankruptcy proceedings

Based on the foregoing reasons, the above named individuals respectfully request that the Debtors' Second Omnibus Objection to Claims (Non-Substantive) be denied and that their claims be maintained in this bankruptcy proceeding.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was mailed, postage prepaid, this 4th day of August, 2003, to following:

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